

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

THE STATE OF TEXAS,

§

*Plaintiff,*

§

v.

CIVIL ACTION NO. 2:23-cv-00055

U.S. DEPARTMENT OF HOMELAND  
SECURITY, *et al.*,

§

*Defendants.*

§

§

§

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE  
TO EXCEED PAGE LIMITATIONS**

Plaintiff the State of Texas requests that the Court extend the page limitations for its Motion for Preliminary Injunction or Stay of Agency Action from 20 pages to 40 pages. Defendants do not oppose this motion. The additional pages are necessary to fully address the important issues before the Court.

A proposed order is attached.

Dated: October 24, 2023.

**KEN PAXTON**  
Attorney General of Texas

**BRENT WEBSTER**  
First Assistant Attorney General

**GRANT DORFMAN**  
Deputy First Assistant Attorney General

**RALPH MOLINA**  
Deputy Attorney General for Legal Strategy

**ROBERT HENNEKE**  
Texas Bar No. 24046058  
Texas Public Policy Foundation  
901 Congress Ave.  
Austin, Texas 78701  
(512) 472-2700  
rhenneke@texaspolicy.com

Respectfully submitted.

*/s/ Ryan D. Walters*  
**RYAN D. WALTERS**  
Chief, Special Litigation Division  
Texas Bar No. 24105085

**SUSANNA DOKUPIL**  
Special Counsel  
Texas Bar No. 24034419

**MUNERA AL-FUHAID**  
Special Counsel  
Texas Bar No. 24094501

**AMY S. HILTON**  
Special Counsel  
Texas Bar No. 24097834

**HEATHER L. DYER**  
Special Counsel  
Texas Bar No. 24123044

Office of the Attorney General  
Special Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 936-1706  
Ryan.Walters@oag.texas.gov  
Munera.Al-Fuhaid@oag.texas.gov  
Susanna.Dokupil@oag.texas.gov  
Amy.Hilton@oag.texas.gov  
Heather.Dyer@oag.texas.gov

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

I certify that I conferred via email with counsel for Defendants, Jean Lin of the U.S. Department of Justice, Civil Division, Federal Programs Branch, regarding the relief requested in this motion. Counsel for Defendants stated that they do not oppose the motion.

*/s/Ryan D. Walters*  
RYAN D. WALTERS

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 24, 2023, which automatically serves all counsel of record who are registered to receive notices in this case. I also served a copy of this document via email to counsel for Defendants, Jean Lin, at Jean.Lin@usdoj.gov.

*/s/Ryan D. Walters*  
RYAN D. WALTERS